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*Attorneys for Defendants ERC Specialists,
The Law Office of Rocky Crofts and Rocky D. Crofts*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

YAYAS KITCHEN, LLC, a Nevada limited
liability company,

Plaintiff,

vs.

ERC SPECIALISTS, LLC., a Utah limited
liability company; THE LAW OFFICE OF
ROCKY D CROFTS, LLC; ROCKY D.
CROFTS, an individual; DOES I through X,
inclusive; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

CASE NO. 2:23-cv-01558-GMN-VCF

**STIPULATED MOTION TO DISMISS
AND [PROPOSED] ORDER FOR
DISMISSAL WITH PREJUDICE**

Under Fed. R. Civ. P. 41(a)(1)(A)(ii), Defendants ERC Specialists, LLC, The Law Office of Rocky D. Crofts, LLC, and Rocky D. Crofts (collectively referred to as “Defendants”), and Plaintiff Yayas Kitchen, move the Court for entry of an Order to dismiss Plaintiff’s Complaint and Defendants’ Counterclaim with prejudice. The parties have fully resolved and settled this case. Each party will bear their own fees and costs.

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Yayas Kitchen v. ERC Specialists, LLC, et al.
2:23-cv-01558-GMN-VCF
Stipulated Motion to Dismiss and [Proposed] Order for Dismissal with Prejudice

Dated the 8th day of December, 2023.

/s/ James A. Beckstrom
James A. Beckstrom, Esq.
Nevada Bar No. 14032
BECKSTROM & BECKSTROM, LLP
400 South 4th Street, Ste. 650
Las Vegas, Nevada 89101

Dated the 8th day of December, 2023.

/s/ Brian K. Terry
Brian K. Terry, Esq.
Nevada Bar No. 3171
THORNDAL ARMSTRONG, PC
1100 East Bridger Avenue
Las Vegas, NV 89101-5315

IT IS SO ORDERED:

This case shall be dismissed with prejudice, with each party to bear their own fees and costs.

UNITED STATES JUDGE

DATED: _____

Jalene A. Anderson

From: Brian K. Terry
Sent: Friday, December 8, 2023 1:19 PM
To: Jalene A. Anderson
Subject: FW: ERCS and Crofts adv. Yayas - Signed Settlement Agreement

[Brian K. Terry](#) | Shareholder | Thorndal Armstrong, PC
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From: Ryan P. Atkinson <ratkinson@Strongandhanni.com>
Sent: Friday, December 8, 2023 12:52 PM
To: James Beckstrom <JB@beckstromlaw.com>; Brian K. Terry <BKT@thorndal.com>
Cc: Jordan Greenburg <jgreenburg@strongandhanni.com>
Subject: RE: ERCS and Crofts adv. Yayas - Signed Settlement Agreement

Me too.

Thanks,

Ryan P. Atkinson
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Cc: Jordan Greenburg <jgreenburg@strongandhanni.com>
Subject: RE: ERCS and Crofts adv. Yayas - Signed Settlement Agreement

Good with me.

James A. Beckstrom, Esq.

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**BECKSTROM
& BECKSTROM**
Attorneys and Counselors at Law

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Subject: RE: ERCS and Crofts adv. Yayas - Signed Settlement Agreement

Ryan and James,

Just to make sure, I will file the revised by James stip and order, correct?

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